

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Ross Riddles

Title: Manager—Financial Planning &
Analysis

REQUEST: Joint Parties' Second Set of Discovery

DATED: January 15, 2004

ITEM: Joint Parties 2-1 Please provide in electronic spreadsheet (Excel) form, separately for each carrier named as a self-provisioning switch trigger candidate, the following information:

- a. The number of in-service, 2-wire analog UNE loops, by wire center identified by CLLI:
 - i. At end of the most recent one-month period for which such data is available. Please identify the month and year for which such data applies.
 - ii. At the end of the one-month period ending six (6) months prior to one-month period identified in sub-part i. Please identify the month and year for which such data applies.
 - iii. At the end of the one-month period ending twelve (12) months prior to the one-month period identified in sub-part i. Please identify the month and year for which such data applies.
- b. The number of in-service DS-1 UNE loops, by wire center identified by CLLI.
 - i. At the end of the most recent one-month period for which such data is available. Please identify the month and year for which such data applies.
 - ii. At the end of the one-month period ending six (6) months prior to one-month period identified in sub-part i. Please identify the month and year for which such data applies.
 - iii. At the end of the on-month period ending twelve (12) months prior to the one-month period identified in sub-part i. Please identify the month and year for which such data applies.

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- c. The number of in-service DS-1 Special Access lines, by wire center identified by CLLI:
 - i. At the end of the most recent one-month period for which such data is available. Please identify the month and year for which such data applies.
 - ii. At the end of the one-month period ending six (6) months prior to one-month period identified in sub-part i. Please identify the month and year for which such data applies.
 - iii. At the end of the one-month period twelve (12) months prior to the one-month period identified in sub-part i. Please identify the month and year for which such data applies.

REPLY:

- a. Please see the attached file that shows 2-wire analog UNE loops, by wire center identified by carrier, as of October 2003. Information for other time periods is not readily available and would require a special study. The attachment is proprietary, confidential and competitively sensitive and is being provided to the Department and parties in accordance with the terms of the Department's Protective Order.
- b. Information for DS-1 UNE loops, by wire center identified by carrier, is not readily available and would require a special study.
- c. Information for DS-1 Special Access lines, by wire center identified by carrier, is not readily available and would require a special study to produce such data.